

EXHIBIT 2

Objections to Subpoena of Dave Ramsey

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

BRAD AMOS,)	
)	Case No. 3:21-cv-00923
Plaintiff,)	
)	District Judge Richardson
v.)	
)	Magistrate Judge Holmes
THE LAMPO GROUP, LLC,)	
)	Jury Demand
Defendant.)	

OBJECTIONS TO SUBPOENA TO DAVE RAMSEY

Defendant The Lampo Group, LLC (“Lampo”) and Dave Ramsey, individually, hereby provide their objections to the February 19, 2025 subpoena of Dave Ramsey for testimony at trial in the above-captioned matter under Fed. R. Civ. P. 45:

- Mr. Ramsey does not have unique, firsthand personal knowledge of the facts of this case. Mr. Ramsey’s only knowledge of the facts relevant to the case appears to be secondhand hearsay duplicative of testimony that could better be offered through the firsthand accounts of other witnesses.
- Mr. Ramsey’s limited potentially admissible testimony is irrelevant to the claims and defenses of the parties in this case as it will not have any tendency to make a fact of consequence to determining this action more or less probable. *Cf.* Fed. R. Evid. 401.
- Much of Mr. Ramsey’s knowledge of the case comes from conversations with counsel and is protected by attorney-client privilege. *See* Fed. R. Civ. P. 45(d)(3)(A)(iii).
- Plaintiff will have the opportunity to present relevant, admissible evidence through the testimony of the other subpoenaed employees.

- Plaintiff has no substantial need for Mr. Ramsey's testimony, and no material that Mr. Ramsey could provide cannot be otherwise met without undue hardship to Plaintiff. *Cf.* Fed. R. Civ. P. 45(d)(3)(C)(i).
- Requiring Mr. Ramsey to testify at trial would subject both Lampo and Mr. Ramsey to unnecessary harassment, disruption of business operations, and substantial burden and expense. This burden and expense is undue considering the irrelevance of Mr. Ramsey's testimony and the inevitable press and media coverage that would result. *Cf.* Fed. R. Civ. P. 45(d)(1).

Respectfully submitted,

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CERTIFICATE OF SERVICE

I certify that, on March 5, 2025, I sent a copy of the foregoing document via e-mail to:

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